UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

APR 24 1986

In Reply Refer To: 3HW33

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kenneth R. Bernhardt, President
Hamilton Precision Metals
P. O. Box 4787
Lancaster, PA 17604

Re: PAD 000800680 ← Queen St. Facility

Dear Mr. Bernhardt:

Sections 3004(u) and 3008(h) of the Hazardous and Solid Waste Amendments of 1984 (RCRA Reauthorization) give EPA the authority to require corrective action for all releases of hazardous wastes or constituents from any solid waste management unit ("SWMU") as defined on the enclosed sheet. This requirement applies to operating units, inactive units, as well as those that are closing or have been closed in the past.

EPA and the State must first determine the location of all SWMUs at your facility. Next, we must determine whether or not any "releases" (see definitions) originated at these units. In order to enable us to make these determinations, you must provide the following information:

(1) A topographic map showing the facility and a distance of 1,000 feet around it, at a scale of one-inch equal to not more than 200 feet. In addition to showing the location of the hazardous waste management facilities for which you are seeking a permit, it must locate all existing and former SWMUs at your facility.

(2) For each SWMU, provide a description of the unit's functions, material of construction, dimensions, capacity, ancillary systems (piping), etc. If available, provide engineering drawings of the units and their foundations. For closed facilities, also provide

a copy of the closure plans, a description of how closure was performed and any relevant post-closure information you have available.

(3) For each SWMU, provide a description of all solid wastes including hazardous wastes and hazardous waste constituents received by the units. Also, provide information on quantities of hazardous wastes and hazardous waste constituents received by each SWMU and the dates during which these units operated.

(4) For each solid waste, SWMU, describe any releases (or possible releases) originating at the unit. This should include information on the date of release, type of solid waste, hazardous waste or hazardous waste constituents released, quantity released, nature of the release, extent of migration, and cause of release, for example, an overflow, broken pipe, tank leak, etc. Also, provide any available data which would quantify the nature and extent of environmental contamination including the results of soil, surface water and/or ground water sampling and analysis efforts. Likewise, any monitoring information that indicates releases are not present should also be submitted.

Please be advised that § 3004(u) applies to those treatment/storage/disposal facilities required to obtain RCRA permits. If you are not required to obtain a RCRA permit, please indicate that fact in your response.

Additionally, § 3008(h) applies to all facilities that operated under interim status. In some cases, this provision will not apply to a facility because it never actually operated under interim status; for example, a storage facility that filed for interim status, but never stored for more than 90 days. If you determine that this provision does not apply to your facility, you must list specific reasons that support the fact that you never operated under interim status.

If some or all of the above requested information has been previously submitted to this office, please reference this information in your reply.

We request under Section 3007 of the Act, 42 U.S.C. § 6927, that you submit two copies of the above requested information within forty-five (45) days of your receipt of this letter to both EPA and the Pennsylvania Department of Environmental Resources (PA DER).

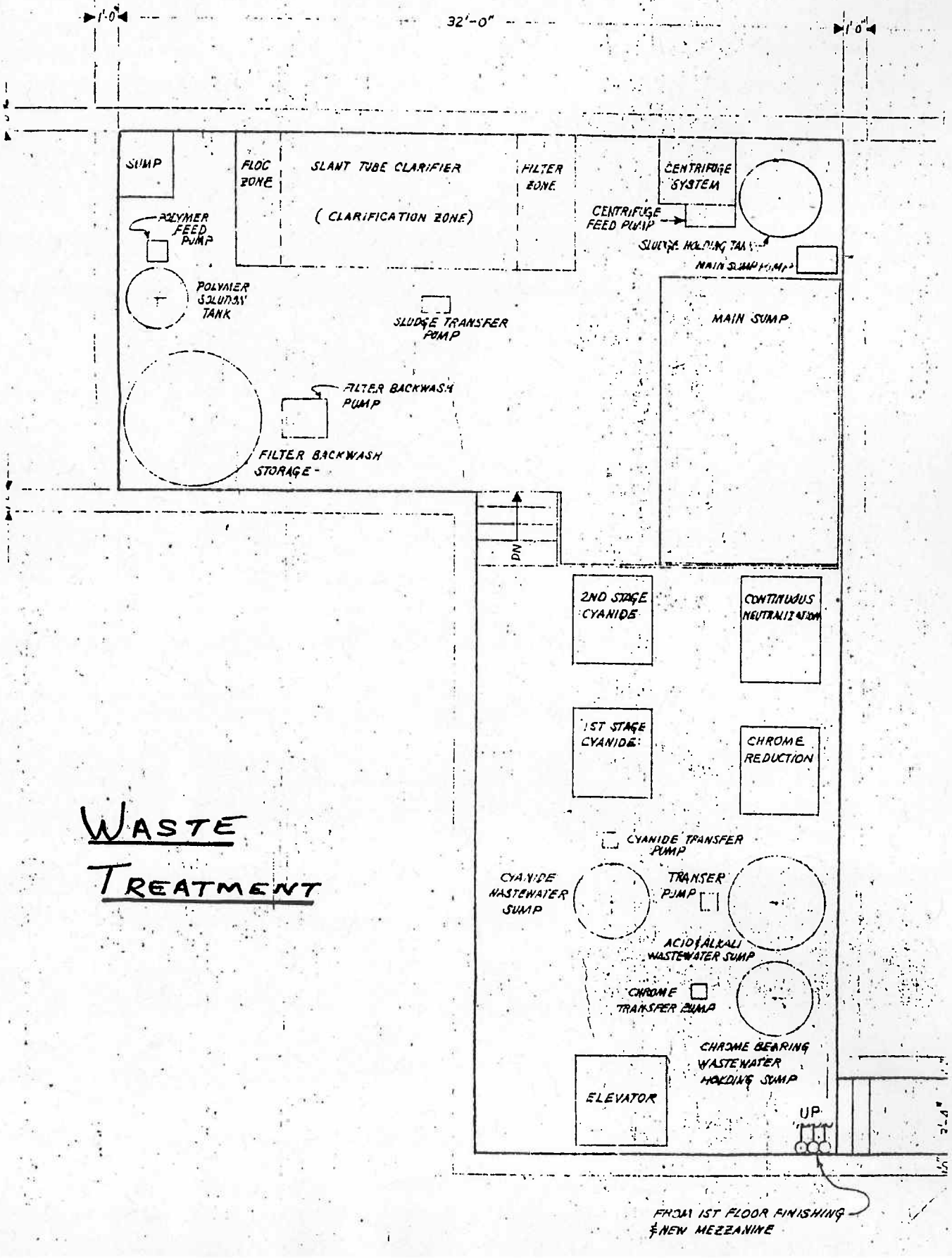
WASTE WATER TREATMENT

Waste Water Treatment is handled by the continuous treatment method and the treatment chemicals are added to the effluent as it is generated. Settling of the sludge is also carried out in a continuous operation. The system is fully automatic and the treatment of effluents and the addition of treatment chemicals is controlled automatically by instruments which are designed to react to the concentration of toxic compounds. The system ensures that the correct quantity of chemical reagent is added.

Effluents are treated for Mechanically Contaminated Effluents, Acid Pickling Solutions, Alkaline Pickling Solutions, Electroplating Solutions, Chromic Acid Solutions, Phosphating Solutions and Cyanide Solutions.

The Waste Treatment System was engineered, designed and built by Metpro Corporation for our application.

Sludge removal is handled by pumping to an approved holding tank for later removal by an approved hazardous waste removal source.



WASTE TREATMENT

SLUDGE STORAGE TANK

Presently, wastewater treatment sludge from Hamilton Technology's wastewater treatment system is deposited into 55 gallon lidded drums from the centrifuge in the treatment and storage area shown on the facility drawing (006171). Drums of sludge are held in this area until they can be moved to the storage room at the northeast corner of the building. When periodic pickups are made by a licensed hazardous waste hauler, the drums are moved from the storage room to the freight elevator and up to the loading dock area directly above the storage room. There, the lids are removed from the drums, and the waste material is vacuumed from the drums into a bulk tanker for removal from the facility.

The new system for handling the sludge will pump the sludge, using a Warren Rupp positive displacement diaphragm pump, through a 3 inch diameter PVC pipeline running through the first floor area, from the treatment room to the 18 foot by 43 foot room located next to the present storage room at the north end of the building. The sludge storage tank will be located in a pit measuring 18 feet by 18 feet by 40 inches deep located on the north end of the room. The walls and floor of the pit are solid concrete. The pit floor slopes to a sump on one side from which spilled material could be pumped. This pit will act as the containment structure for the tank, having a capacity of about 8,000 gallons. The tank's capacity will be 2,693 gallons. The dimensions are 12' by 12' by 2'8" deep. Construction materials will be welded 1/4" thick boiler plate steel. Details of the tank construction are shown on drawing 006178, "Sludge Tank and Covers." The tank will be coated with an epoxy-base paint inside and will be painted outside to prevent corrosion. The sludge is close to neutral pH and has no unusual corrosive properties. Positioning of the sludge tank in the pit is shown on the Incinerator Room drawing (#006157).

This storage room will also be used for storage of waste solvents and oils in 55 gallon drums. Forty-eight drums of waste solvent (2 high) can be stored over the pit area on a metal grating that will be installed over the pit and sludge tank. Since the tank will be sloped and covered, any spilled or leaked material will also be contained in the open area of the underlying pit. A layout showing one arrangement of drums that would meet regulation requirements is shown on Incinerator Room drawing (006177). None of the wastes stored in in the storage room are incompatible. A sprinkler system is located in the room and fire extinguishers are available. The walls of the room are cement block, the floor is concrete, and the ceiling is steel and concrete.

Sludge shipments will be made by extending the vacuum hose from the tank truck, which will be located above the storage room at the loading dock, through a trap door into the storage room and into the sludge tank. This sludge handling system, then, will eliminate all manual handling of sludge, thereby reducing chances of spills and increasing the overall efficiency of the operation.

A high level alarm will be installed on the tank to warn before an unsafe level would be reached. Flow to the tank can be stopped simply by shutting off the pump that transfers the sludge from the wastewater treatment area. A valve will also be placed on the end of the 3 inch pipe immediately before it discharges into the tank.

If a major problem arose with the storage tank or the pump, sludge could be handled temporarily by depositing it into 55 gallon drums as is the present practice.

Inspections of the tank will be done on a daily basis for the following items:

1.) sludge level
2.) construction material for leaks or corrosion
3.) tank functioning properly
4.) any leaked or spilled waste in containment area

Periodic inspections of the inside of the tank will be carried out when sludge is removed by the hauler. Records will be kept of all inspections and will be kept with the operating record.

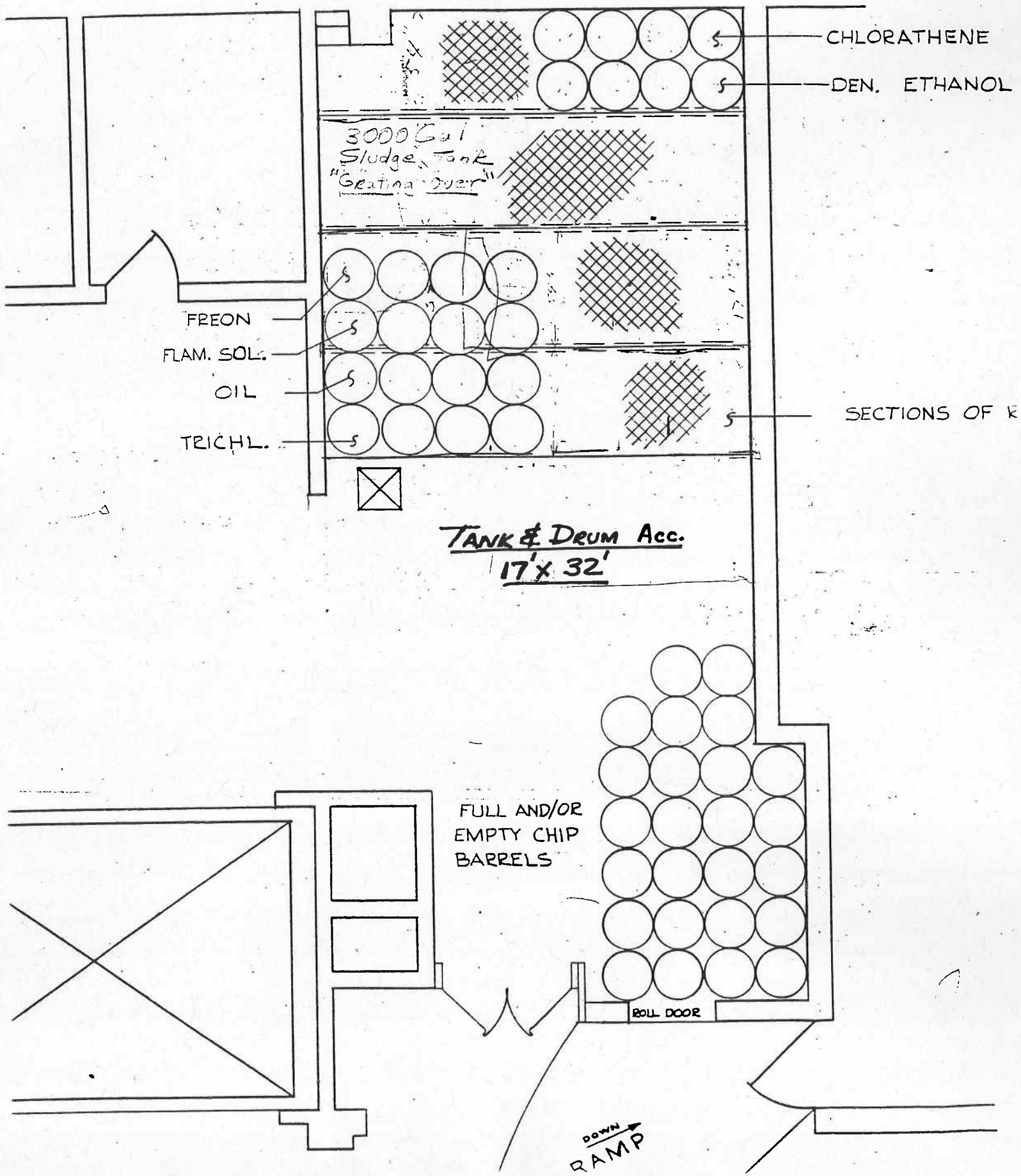
In the event of a suspected tank failure (apparent corrosion or leaked material in containment area), the following procedure would be followed (Tank Evaluation and Repair Plan):

1.) If a leak was discovered, arrangements would be made to have a hazardous waste hauler pump out the contents of the tank and any leaked material from the containment area.
2.) The tank would then be cleaned and the rinsewater would also be removed by the waste hauler.
3.) A thorough inspection of the inside and outside of the tank would be carried out, and the extent of damage would be assessed.
4.) The affected area of the tank would then be spot welded or patch welded as necessary. Any other appropriate repair steps would be carried out.
5.) The repaired and any corroded areas would be cleaned and recoated with primer and epoxy paint.
6.) The tank would be inspected and certified by a registered professional engineer as meeting the design specifications approved in the permit prior to being put back in service.

WASTE QUANTITIES

Hazardous waste quantities for 1985

Wastewaters and spent plating baths from metal finishing operations	27,497	T
Trichloroethane	19,543	K
Denatured Ethanol	1,640	K
Triclorotrifluoroethane	7,992	K
Flammable solvents	4,373	K
Freon	2,960	K
Tricholoroethylene	1,208	K
Sludge	70,475	K
Ferric Chloride	208	K


CHLORATHENE
DEN. ETHANOL
3000 Gal
Sludge Tank
"Grating Over"
FREON
FLAM. SOL.
OIL
TRICHL.
SECTIONS OF K
TANK & DRUM Acc.
17' X 32'
FULL AND/OR
EMPTY CHIP
BARRELS
ROLL DOOR
DOWN
RAMP